

Exhibit F

Elliot S. Alfaro Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON 03-MDL-1570 (GBD)(SN) SEPTEMBER 11, 2001

-----X **AFFIDAVIT OF GERARD**
PATRICK AHEARN, et al., **ELLIOT S. ALFARO, JR.**

Plaintiffs, 20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)

: SS.:

COUNTY OF PALM BEACH)

ELLIOT S. ALFARO, JR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3330 Fairchild Gardens Avenue, No. 30352, Palm Beach Gardens, Florida 33410. 2. My current age is 47, having been born on August 6, 1974.

3. I am the son of Elliot Alfaro, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lymphoma on August 25, 2014. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was a firefighter with the Bridgeport Fire Department. He was a full time firefighter and was on active duty at the time of September 11, 2001. He was required by his work to respond to the World Trade Center, but he would have volunteered his time even if he wasn't required. That's the type of person he was. September 11th was the worst disaster he

ever had to deal with during his career. He would tell me about what a nightmare it was and the sheer amount of destruction. He described how there was no hope of finding survivors and how it was even more horrifying because many of the dead were firefighters themselves. We also had a relative who was an FDNY fireman who was killed in the collapse of the first building. That made it hit even closer to home for us.

6. My father was diagnosed with cancer in 2003. That was the first time I learned that he had cancer. He had a long battle with cancer until his death in 2014. He went through many chemotherapy treatments at Bridgeport Hospital. His bones became brittle from the cancer, and he ended up breaking his hip. I remember asking him about how his physical therapy was going, and he said it was very difficult. My dad was a positive person, so it was hard to see him suffer and complain when I knew that he wanted to be positive.

7. It was very upsetting for me to see my father ill. He was an athletic person who played baseball, softball, and basketball most of his life. He played in softball tournaments with the fire department. I would always play catch and baseball growing up with him, so I knew how physically active he was.

8. When my father fell ill, I was living in Hawaii. I called my father all the time, just to talk to him and provide moral support. During most of his cancer treatment, I could not be there in person. It was one of the most difficult times in my life. I remember talking to my dad, who told me it took a lot of his energy to deal with the cancer.

9. My father was a rare breed of person. He was a fireman because he wanted to help people. He was a humble and peaceful person, and he never wanted to be called a hero. He never bragged, and he wasn't in it for the money. He taught me many life lessons. I miss not being able to pick up the phone and call him, and I miss not being able to hear his voice. He could have had such a great life and retirement if he had survived. I hope to have children one day, and I know he would have been a wonderful grandfather. I miss him terribly.

State: VA & County: Prince William (SS)

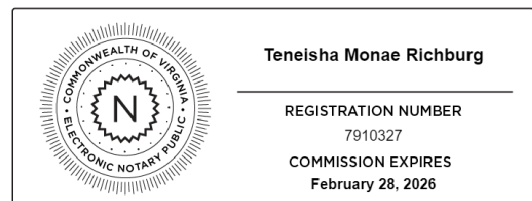
Sworn to before me this

11th day of June, 2022

7-11-22

Notary Signature: *Teneisha Monae Richburg*

ESA XXXXXXXXXXXXXXXXXXXX *Elliot Spencer Alfaro*
ELLIOT S. ALFARO, JR. XXX ESA



Amanda Coyne

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

Plaintiffs,

AFFIDAVIT OF
AMANDA COYNE

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

AMANDA COYNE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 852 South Broadway, Lindenhurst NY 11757.

2. My current age is 28 years old, having been born on July 26, 1993.

3. I am the daughter of Ronald Thomas Coyne, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father suffered from chronic bronchitis and pancreatitis and died on June 25, 2013. It was determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. My father was involved in my life every day. We would go out for drives, hang out around the house. He brought me to all my baton competitions, and we would listen to music together while cleaning the house. We spent a lot of time together.

6. I was eight years old when 9/11 happened. I know that he was called in from Brooklyn, and he was gone the whole night. I was terrified and just wanted him to come home.

I know he was near the second tower of the World Trade Center when it fell, and he jumped into a car in order to save himself. When he came home the next morning, he was covered in ash. He broke down as he came in the door and fell to the ground. You could see he was emotionally and physically drained. He cried as he hugged each of us, so happy he was with us again. I had never seen my father so tired and emotional, and it was overwhelming.

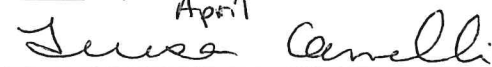
7. I feel as though he was sick from that day on. He had bronchitis all the time, and he would get pneumonia every year. From the time he came home on September 12th, I always remember him having respiratory issues.

8. It was hard to see my dad sick all the time, but at the same time he was so strong. He hid most of it, and fought through it. He stayed out of work for quite a while, but once he returned he went to work every single day. He still brought me to all my baton competitions. I remember we would drive to Pennsylvania every year for that. Emotionally, for me, it was hard to go through that. But he hid it very well from us. He was so strong.

9. It was so hard to see what he went through. It robbed us of the closeness and good times we had and were supposed to have in the future. He has missed out on so many things in my life that he should have been a part of. Same for the future. That hurts me to my core. He got so sick from doing something that was so amazing. He saved so many lives that day, and unfortunately it ended up taking his life, and a part of mine.


AMANDA COYNE

Sworn to before me this
5 day of ~~March~~ April, 2022



Notary Public

TERESA CARVELLI
Notary Public, State of New York
No. 01CA6209900
Qualified in Nassau County
Commission Expires in August 3, 2025

Judith Coyne

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JUDITH COYNE**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

JUDITH COYNE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 852 South Broadway, Lindenhurst NY 11757.
2. I am currently 56 years old, having been born on April 15, 1965.
3. I am the wife of Ronald Thomas Coyne, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My husband died from respiratory disease on June 25, 2013, at the age of 45. His illness was determined by the World Trade Center Health to be causally connected to his exposure to the toxic air resulting from the 9/11 terrorist attacks.
5. Before Ronald's illness, we had a very active life. We were raising four kids at one time; our three biological children and my niece. He was an amazing father and very active with the kids. He supervised their youth group at church. Whenever he wasn't at work, he was with me and the kids.
6. My husband was an EMT for the New York City Fire Department. He was supposed to be off from work on September 11, 2001, but he took someone else's shift. Our

family always had a disaster plan in place – just stay where you are, and if that wasn’t possible, we were to all meet at home. That morning, he called me when he was on his way to the World Trade Center. He said, “Our plan is in place, everything is fine. I know you’ve heard things on the news, but I promise I’m going to be fine. I will contact you when I can. But I have to go and do my job.”

7. Ronald went through hell that night. He was helping people in the South Tower when it started to collapse. His uniform caught fire and he got burnt. Once outside, he broke the back window of a nearby SUV with this Mag-Lite and sheltered in it. The falling metal and concrete from the tower caused the SUV to flip over and he was trapped. He said there was so much soot and ash that he couldn’t breathe. I had received a couple of phone calls from the FDNY that evening, first saying that Ronald was missing, and then that he had been burned and was taken to the hospital. The nape of his neck was completely burnt, plus he had second degree burns on his back. I had four young children in the house that I couldn’t leave alone, so I wasn’t able to go and be with him. It was one of the worst nights of my life. I was scared and so many things were going through my mind. My eldest son came to me and asked if his dad was gone. That broke my heart. I couldn’t answer him. I told him not to mention anything to the other kids and we’d discuss it in the morning. I finally heard from Ronald the next morning. He was being released from Kings County Hospital and coming home.

8. When he came home, he was covered in ash and his uniform had clearly been burned. He collapsed on the floor from exhaustion. I helped him to the bathroom to take a shower. I was pulling pieces of concrete out of his scalp that fell on him from the collapse of the tower.

9. After 9/11, Ronald was home for a year and a half. I was happy to have him physically, but mentally he was a changed person. He received a letter from the FDNY stating that what he ingested and inhaled on that day was a “toxic cocktail.” I still have that letter. Most of his illness was internal—there were no visible injuries. But the mental instability was more horrifying for me than the physical. I didn’t know how to help him cope with either the physical or mental symptoms.

10. It took a toll on our marriage. He was on leave for a year and a half after 9/11, and financially that year was very difficult. I had to refinance our mortgage just so that we didn’t



lose our house. When he was home for those eighteen months, I was constantly taking him to doctor's appointments. His respiratory issues became worse and worse. There was no such thing as vacation anymore. He was constantly in and out of the hospital. After his eighteen-month leave, Ronald was told by the FDNY to either come back to work or be fired after his eighteen-month leave. So, he went back to work, even though he was still sick. There were times where he'd have walking pneumonia and still went to work. The extra money that Ronald made from working night shifts was a big deal for us. I had to work more, and I didn't make as much money as him. We made do, but it was very, very hard.

11. Ronald suffered from terrible nightmares from what he witnessed on 9/11. Many nights he would wake up screaming or crying. He would tell me the things he saw, but I couldn't handle it and had to tell him not to tell me. That made me feel terrible because I felt I couldn't be there for him in that respect. I urged him to see a therapist so he could talk about all his issues. He saw a therapist until the day he died. He was prescribed sleeping medication. There were times that he had to cancel his appointments or ran out of medications, and those were terrible times for me and the kids because we saw him so upset. I had to sit down my kids and explain to them, "We need to give Dad some space." My kids would call me at work and say, "Dad has been staring out the window for three hours, and we don't know what he's looking at." I didn't sleep a full night of sleep for years—the nightmares and the snoring from his sleep apnea would keep me awake. I also wouldn't sleep if I didn't hear him snoring, because I was afraid he had stopped breathing. I was in fear everyday that I would lose my husband and my kids would lose their father.

12. My family and I suffered so much from my husband's illness and death, and I feel strongly that those responsible should be held accountable.


JUDITH COYNE

Sworn to before me this
31 day of March, 2022


Notary Public


ANTOINETTE SNYDER
NOTARY PUBLIC OF NEW JERSEY
Comm. # 50077133
My Commission Expires 2/15/2023

Margaret McMahon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

Plaintiffs,

AFFIDAVIT OF
MARGARET MCMAHON

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF QUEENS)

MARGARET MCMAHON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 234 Beach 119th Street, Rockaway Park, NY ~~10694~~ ¹¹⁶⁹⁴.

2. My current age is 57 years old, having been born on October 8, 1964.

3. I am the sister of Ronald Thomas Coyne, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Ronald died from respiratory disease on June 1, 2013. He was only 45 years old. As has already been determined by the World Trade Center Health Program, his illness was causally connected to his exposure to the toxins resulting from the 9/11 terrorist attacks on the World Trade Center.

5. Ronald and I were best friends for our whole lives. He was my little brother. In about 2000, I started to make some selfish choices that affected our relationship. We didn't speak as often as we had, but I thought of him a great deal. We had resumed our close relationship at the time Ronald became sick. I was always so upset with myself that I wasn't

there for him for ten years. He and I re-acquainted about one year before he died, and we saw each other during that time. At least I had that important amount of time with him. But I wish I could have been there more for him, to help when he needed it.

6. My brother responded to the World Trade Center on September 11, 2001. He was an EMT for the FDNY. When the second World Trade Center tower fell, he became trapped inside a vehicle. He was marked as missing, but they found him and brought him to the hospital. He came home in the early morning hours on September 12th and got a few hours of sleep. He went right back to respond the next day. He never stopped working. He worked as an EMT until he couldn't work anymore because of his illness. He worked almost every day until the day he died. I wasn't aware of how ill Ronald was getting. My brother was a very private person; he kept everything to himself.

7. In 2012, I learned that he wasn't doing well, so I came to see him. As soon as I saw him, I was shocked and saddened. I knew something was wrong. He looked sick. My brother is four years younger than me, and he was a healthy young man. But when I saw him, he looked like an old man. His skin was sagging, and he had lost a significant amount of weight. He looked so unhealthy. That's when he started sharing with me what was going on. It didn't occur to him that he would get sick after his exposure on 9/11. He didn't know what was happening to him. He kept telling me, "the doctors aren't diagnosing me with anything, but I know something's wrong." He was recognizing that prior to the diagnoses—he also saw that others in his FDNY "family" were going through the same thing and becoming ill.

8. The doctors soon told him that his "pancreas was basically rotting inside of him" and that he had to go on an insulin pump. His mental state of mind was that he was a fighter...he didn't want to sit at home and be sick. He wanted to show up for work. I was totally devastated. It was hard for me to watch him suffer, especially because he kept so much to himself. I noticed that he and his family were struggling financially, but I was not in a position to help him.

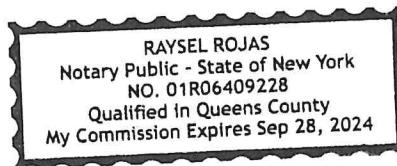
9. Personally, I know Ronald felt like he was just let down. He knew he wouldn't be sick if it wasn't for his exposure at the World Trade Center. Everything (illness-related) that was going on with him, was also going on with other people. He gave his community so much, and he was so passionate. I am grateful for the years I had with him. He will always be my baby

brother, and I miss him every day.

Margaret McMahon
MARGARET MCMAHON

Sworn to before me this
1st day of ~~March~~, 2022

Rayel Rojas
Notary Public



Joseph E. Dellacona

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JOSEPH E. DELLACONA**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

JOSEPH E DELLACONA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11 Baker Lane, Levittown, NY 11756.

2. I am currently 46 years old, having been born on January 10, 1976.

3. I am the son of Richard A. Dellacona, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from leiomyosarcoma on September 3, 2012. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was my best friend. He was active in my life in many different ways. He was grandfather to my two children, who had a very close relationship with him. He came to all their sporting events, dance recitals, and school plays. He was very involved in their lives. My dad and I worked together for a year at Martin Van Buren High School, where he was a math teacher and assistant principal. I was a history teacher and a substitute there. We were very close. I was a single father, and my dad helped me raise my kids. He would watch them every

Wednesday night and sometimes on the weekends. We went on vacations together and to dinners with the Westbury Fire Department.

6. My father was the Chief of the Westbury Fire Department. He brought in two or three fire trucks from Westbury to the World Trade Center on 9/11/2001. I told him to be careful, and said, "You know, the air isn't clean down there." He told me he knew that, but he had to do what he had to do. He was a "first guy in, last guy out" type of person. He responded to the World Trade Center for the first three days after 9/11. He said he couldn't believe his eyes. It was hard to witness so much death and destruction.

7. I knew there was something wrong with him for months before his cancer diagnosis. He kept complaining about a pain in his leg, but the doctors couldn't find anything. I had a feeling that he wasn't completely well. Once he was diagnosed, everything went extremely fast. He was diagnosed in May or June of 2012 and died in September 2012. He told me, "Don't worry, it's not going to be so bad." But he deteriorated quite rapidly. When my father became ill, it was harder for me to take care of my children. He was their built-in babysitter and best friend. If the kids wanted something, he always bought it for them. He did all sorts of repairs around my house. It was hard seeing the same man so withered from illness.

8. It was devastating. It was one of the worst times I've ever been through in my life. His illness destroyed me inside, and it destroyed my two kids. My son is a good boy, but he had a lot of anger issues because of my father's illness. They were extremely close. My son lost his innocence. Unfortunately, my son started down the wrong path, and it took him a lot to get back on the right path. He was a star athlete, but after my father's death, he dropped out of school and got into drugs. I had to battle with that on top of losing my father. My daughter, who was also close with my father, was suffering too. She started getting into fights at school. Both my kids had a lot of anger and resentment towards the world. My father was everything to my kids. It was definitely a difficult moment in all of our lives.

9. I took time off from work whenever my father was having an MRI, or when he was in the hospital. I tried to be there for him as much as possible. I would come up to his house many nights just to stay with him.

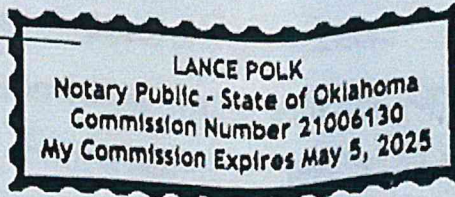
10. My father was a great, selfless man. He always tried to help others before helping himself. He chose to go down to the World Trade Center to help, even though he didn't have to. The fact that he sacrificed his own well-being to help others speaks volumes. He was a pure

human being, salt of the earth. Our family, and the world, lost a great man.

Joseph Dellacena
JOSEPH E DELLAONA

Sworn to before me this
22nd day of July, 2022

Lance Polk
Notary Public



Richard A. Dellacona Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF RICHARD A.
DELLACONA, JR.**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF ARIZONA)
 : SS.:
COUNTY OF MARICOPA)

RICHARD A. DELLACONA, JR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 4254 East Dublin Street, Gilbert AZ 85295.

2. My current age is 44, having been born on October 27, 1977.

3. I am the son of Richard A. Dellacona, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from leiomyosarcoma on September 3, 2012. It was determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Even though distance kept us apart, we had a strong father and son relationship. My father was my everything. He was my supporter, my mentor, and my hero. He was my sounding board and my best friend. We never really fought in my thirty-five years with him. It was hard to live so far away, but it didn't seem far away because I could just pick up the phone and give him a call for any reason. Even if there was no reason. I would visit him, and we

would have a great time together just being father and son.

6. My father was the chief of the Westbury Fire Department at the time of 9/11/2001. He had just been appointed fire chief five months earlier. He felt that it was his duty to serve New York City, even though he was on Long Island. He went down to the World Trade Center on the evening of 9/11 with his team. I didn't want him to go down there because I thought it would be unsafe, but I wasn't even thinking of the exposure at the time. My father believed that it was his duty to help. I didn't think much of it after that until he got sick.

7. My father found out that he had a tumor at a doctor's appointment in July 2012. He didn't seem right for some time before that. I was in college at the time, and he complained a lot of his leg pain. He was told at first that he had sciatica, so he didn't think much of it at the time. But he didn't have as much energy as he used to, and he had trouble walking. He was just miserable, in hindsight. When he was diagnosed with leiomyosarcoma, it was already Stage IV. He couldn't undergo any treatments at that point. The hospitals did nothing for him, they just strung him along. By the time they talked about treatment, it was too late. He could've possibly had this tumor for years, but somebody mis-diagnosed him.

8. It was really tough to see someone who had never been sick a day in his life all of a sudden become scared and be in a lot of pain. I didn't know how to help him, and I didn't know who to reach out to in order to get him help. It ruined me for some time. When I realized there was nothing else we could do, I decided that it was better for him to be around loved ones for his final days and weeks. He was sick for about five weeks before his passing. I came to visit him twice during that time, once in early August 2012. I spent time with him at home and at the hospital. I tried to keep him comfortable and ran errands for him. I didn't know that when I returned, I would be returning for the final time. He couldn't even speak for more than thirty seconds at a time. His sixtieth birthday was on August 22nd. In the end of August, I was able to speak with him for ten minutes. He told me he was feeling good and looking forward to possible future treatments. But when I came over to his house the next day, he wasn't able to speak at all. It was the most unbearable pain anyone could experience. I told him I loved him as he was in and out of consciousness. I flew home that night, September 3rd, and he passed away in the hospital.

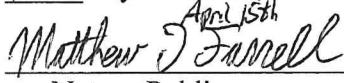
9. My father was like all the other heroes. They didn't have to do what they did: the firefighters, police officers, EMTs, hospital workers, iron workers, and construction workers.

They didn't have to put their own lives at risk for the lives of others. No amount of money could make a difference, but someone has to be held responsible for all these lives destroyed. It's hard every day. But if it weren't for these people—people like my father—we wouldn't have heroes.

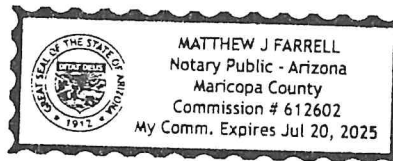


RICHARD A. DELLACONA, JR.

Sworn to before me this
15th day of ~~March~~, 2022



Notary Public



Fortunate Schulz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
FORTUNATE SCHULZ**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

FORTUNATE SCHULZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 895 Plum Tree Road West, Westbury NY 11590.

2. I am currently 72 years old, having been born on September 8, 1949.

3. I am the wife of Richard A. Dellacona, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from leiomyosarcoma on September 3, 2012. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Richard and I were like two peas in a pod. Both he and I were widowed prior to our marriage, so we were especially close because of that. Socially, we were very active. We vacationed together, lived together, we did everything together. We were very close. Richard was the Chief of the Westbury Fire Department for over thirty years before he died. His full-time job was Assistant Principal for Martin Van Buren High School. I was a nurse at Stony Brook University Hospital.

6. On 9/11, I learned of the Twin Towers coming down from someone in my workplace. I immediately called my husband, who was working in the school at the time. He called the Westbury Fire Department to let them know he was available to respond. The hospital mandated me to stay because we were a Level I Trauma Center and were expecting to receive and treat survivors from the World Trade Center. I stayed at the hospital working for three days straight, while Richard went down to Ground Zero with the fire department. I waited for hours at the hospital before I slowly understood that we weren't going to get any survivors. It was a terrible realization. No one knew how bad it would be. Even if Richard had known the outcome, he would have responded anyway. My husband came home and intermittently returned to Ground Zero the next several weeks. Because he was the Chief of the department, he had to spend many days at the Command Post directing his team.

7. Richard was a man who never complained about anything. If he expected steak but was served a sandwich, he wouldn't complain about it. In all the years that we were married, he had the flu only once. He was never sick. He was healthy and extremely active. A year or two after 9/11, he started to have trouble with his legs. He would often fall and developed back pain. His right leg used to give him issues, and we would call it the "bad leg." Our grandchildren knew that "Pop-Pop's right leg is the bad leg." I thought at first that it was sciatica, but it got worse and worse. His leg was swollen, and he couldn't walk. His feet were so swollen that he could barely fit his feet into shoes. His stomach was also distended.

8. The day before we were supposed to leave for vacation, we went to an orthopedic surgeon, who took an MRI. He urged us to get Richard to an oncology hospital immediately. I took him to North Shore Hospital. I almost passed out when I learned he had cancer. As soon as we got to the emergency room and were able to talk to a doctor, he started talking to me about quality of life. I remember thinking to myself, oh my God, he's going to die. I knew Richard was sick and was in a lot of trouble. He passed away only six weeks following his diagnosis.

9. I went into a terrible state of depression and was diagnosed with post-traumatic stress disorder after Richard's death. I am still distraught. Certain memories will come up and trigger my PTSD, putting me into a panic attack. Emotionally, Richard's death just about killed me. Physically, I had to go on.

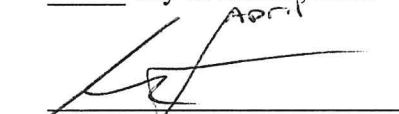
10. Richard was the kindest, gentlest, most giving person I have ever known. When we got married, I had three grown children and he had two grown sons and grandchildren. But

we never did the “mine and yours.” It was always “ours.” My grandchildren never knew their biological grandfather, but Richard was grandfather to all seven of my grandchildren. Richard’s legacy is in his family. When he died, the principal of Martin Van Buren High School (where Richard worked) told us, “Richard was Van Buren’s favorite son.” He was a student there, a teacher there, and an assistant vice principal. Richard didn’t have an enemy in the world.

11. The spouses, widows, widowers, and children of 9/11 First Responders got screwed. Every year I go to the 9/11 Memorial ceremony at Long Beach Point Lookout. It was only about two years ago that they really started to talk about the first responders who passed and are continuing to die. I’ve always felt like Richard’s life was given less worth than the people he went searching for in the rubble. He was a strong, proud, intelligent man. I applied to all the memorials on his behalf so he could leave a legacy behind. It’s important for our children and grandchildren to know that his name lives on. The legacy he left behind is the love he had for his family.


FORTUNATE SCHULZ

Sworn to before me this
15th day of March, 2022


Notary Public

MATTHEW J. FLAHERTY
Certified Notary State of New York
County: Nassau
Reg. #01FL6202072
Exp: 3/09/20 25

MATTHEW J. FLAHERTY
Certified Notary State of New York
County: Nassau
Reg. #01FL6202072
Exp: 3/09/20 25

Mary Ferguson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
MARY FERGUSON**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF QUEENS)

MARY FERGUSON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 41-15 50th Avenue, Sunnyside NY 11104

2. I am currently 70 years old, having been born on January 8, 1952.

3. I am the wife of Charles Ferguson, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from esophageal cancer on October 10, 2016. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. We did everything together. We traveled all over the place. We went to Europe, and we went on cruises. We had a full, active life. We went to concerts, to Carnegie Hall, loved the Mets and often went to baseball games during the season. We had a beautiful, wonderful life together. Every weekend we were doing something, until Charlie got sick. Even when he got sick, we tried our best to go out. Right before he died, we were supposed to go on a cruise. Charlie was so looking forward to that trip.

6. Charlie worked in building maintenance with Local 32B. He worked about three blocks from the World Trade Center. When the first plane hit the North Tower, he went onto the roof of the building. He and his coworkers actually witnessed the second plane hit the South Tower. He said it was shocking. When the towers came down, he went out onto the street and got caught in the cloud of dust. His building turned into a triage center for survivors, so he volunteered there for the next few days. He worked for several days straight on the clean-up effort. Charlie continued to work 40 hours per week or more at the same building until 2015.

7. In 2006, my husband started to have difficulty breathing. He was examined by doctors through the World Trade Center Health Program, who diagnosed him with gastro-esophageal reflux disease (GERD) and asthma. The asthma progressed to emphysema. He started off with inhalers, but later had to start using an oxygen tank. Soon he was on oxygen 24/7. He developed sleep apnea and would wake up in the middle of the night gasping for air. There's nothing worse than witnessing someone who can't breathe. As if breathing issues weren't enough, Charlie was soon diagnosed with esophageal cancer. It wasn't caught in the early stages because his lungs were too weak to handle an endoscopy. He was diagnosed with Stage IV esophageal cancer and given a prognosis of 3 to 6 months to live. When they told me, I just broke down. It was devastatingly awful. I just kept thinking, what am I going to do without him?

8. It was a terrible experience. I had to start going to therapy because I was very emotional about the whole thing, and I didn't want him to know. I had to go on medication. I was very depressed and tried to hide it. We never went out anymore. I tried to get out to go to lunch with friends, but it was hard to leave Charlie alone. I think I was in denial. Overall, he was sick for quite a few years. It was excruciating to watch the person I loved be in so much pain, yet get up every day, shower, shave, and try to do everything to keep things normal as possible, even until the end.

9. Charlie and I were already retired, but after he stopped working in 2015, we had to rely on his disability income. Financially, we were in much worse shape than when he was working. We had to hire an aide to help him towards the end. Charlie used to do all the bills, and I had to get help with that when his illness progressed. I had to hire a money manager at one point because I just didn't know what to do and how to take care of all the things I took for granted because Charlie always handled it. Everything became so much harder once he passed.

10. Charlie was a great guy. He was very popular and well-liked, funny, and he had a lot of friends. When he died, I was left alone to take care of everything. He used to cook for me and help with stuff around the house like a light fixture or something, but now I have to do that all on my own. He'd help me clean around the house and walked our dog. Now, I have to do all that. I miss him terribly, even five and a half years later. I watch something on TV and think, "Oh, Charlie would love this." We did so many great things together. Every time I see an advertisement for a cruise, I start crying. He was a wonderful man, and we had so many wonderful times together. I hold those memories dear in my heart and mourn for the memories we'll never make again.

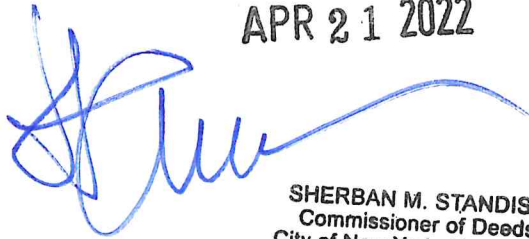

MARY FERGUSON

Sworn to before me this
_____ day of April, 2022

Notary Public

STATE OF NEW YORK
CITY OF NEW YORK
COUNTY OF QUEENS
NOTARY PUBLIC:
SEAL: :

APR 21 2022



SHERBAN M. STANDISH
Commissioner of Deeds
City of New York No. 4-4325
Certificate Filed in Queens County
Commission Expires Feb. 1, 2022

Christopher Flegar

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
CHRISTOPHER FLEGAR**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

CHRISTOPHER FLEGAR, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3 Steward Lane, Manalapan, NJ.

2. I am currently 37 years old, having been born on May 5, 1984.

3. I am the son of Silvano Flegar, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died of leukemia on September 13, 2005. He was only 51 years old. His illness was deemed by the World Trade Center Health Program to be causally connected to his exposure to the air toxins resulting from the September 11, 2001 attacks.

5. Prior to this death, my father and I did everything together. He attended every sporting event, every school function, every parent teacher conference. He was always there for me.

6. On September 11, 2001, my father worked for the New York City Department of Sanitation on the Emergency Response Team. He was one of 50-60 workers on that team. He

was responsible for the four garbage trucks at the corners of the World Trade Center site. He was on site at the World Trade Center every day for six months. He was soaking in all that dust, benzene, asbestos, and other toxins in the air. They said the air was clean, but it definitely was not clean.

7. Before 9/11, my father was pretty much as healthy as could be. He lived a very active lifestyle, and he never really had to go to a doctor. He ran three New York City marathons. In the winter of 2004-2005, I could see that he was starting to slip a little bit. We would play racquetball all the time, and he would always beat me. Then he started to lose, and I thought, maybe it was just because he's getting older. He was 51 at the time. But I could soon see that his endurance was decreasing. I was in high school, and he chaperoned a school trip for my mom's school. I remember he was exhausted the entire time. My mom told him he should go to the doctor. As soon as he went to the doctor and they took his blood work, they sent him straight to the emergency room.

8. One of the nurses in the hospital told me his blood work results were so bad, that they had only seen that low platelet count and hemoglobin count before in dead people. They thought he had acute myeloid leukemia. Between Staten Island Hospital and Sloan Kettering Memorial Hospital, it was totally non-stop. He only lived for about six months following his diagnosis.


9. At the time, I couldn't let it affect my life emotionally. I worked full-time and took a full schedule of college classes. I started working 40-50 hours per week at the age of 19 to send myself to college. My parents didn't have a lot of extra money to save for myself or for my brother. When he was in Staten Island Hospital, I was close by so I would go to see him. When he was in Sloan Kettering Hospital in NYC, I would go from my finance job in downtown Manhattan to visit him at the hospital, and then I would go to my classes in midtown Manhattan. That summer, when he was really sick, I would stay overnight in the hospital with him. I needed to give my mom the opportunity to go home, take a shower and eat a meal because she was staying with him all the time in the hospital. It was really bad for a 20-year-old kid to have to go through.

10. I feel extremely angry when I think about those who sent thousands of men and women to the recovery site for clean-up with no protection at all. We are more protected today

from COVID-19 than those first responders were from the dust at the World Trade Center. I'm also angry at those responsible for these terrorist attacks and feel those involved should be held accountable.

X 
CHRISTOPHER FLEGAR

Sworn to before me this
_____ day of March, 2022


Notary Public



7/1/2022